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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL STEPSKI, KIRSTEN STEPSKI, Wife,
GEAL RODERICK AND BENJAMIN SCHOBER,

06 CV 1694 (JSG)

Plaintiffs,

- against -

THE M/V NORASIA ALYA, her owners,
operators, etc., and MS "ALENA"
SCHIFFAHRTSGESELLSCHAFT mbH & CO.,
KG., PETER DOHLE SCHIFFAHRTS-KG,

Defendants.

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DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

1. Name and Address.
2. Age.
3. Occupation now and past occupations.
4. Marital Status.
5. Spouse's occupation.
6. Education.
7. Do you belong to any union or is anyone in your family a member of a union?
8. Do you have any relationship with any one involved in this case:

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- Attorneys
- Judge
- Parties
- Witnesses

9. Do you have any prior juror experience:

- what type of case?
- how long ago?

10. Do you hold membership in any organizations, groups, clubs, fraternal orders, civic associations?

11. What is your general attitude toward judicial system, courts, lawyers, etc.

12. Have you or a close family member or friend ever been sued or sued anyone?

- For what?
- How long ago?
- Would that experience impact on your service as a juror in this case?

13. Have you ever been a witness testifying in Court?

- For what?
- How long ago?
- Would that experience impact on your service as a juror in this case?

14. Do you have any special feelings towards lawsuits?

15. Do you or does anyone in your family or close friends have any medical training or background?

16. Is anyone in your family or a close friend an attorney, involved in law enforcement or a member of the United States Coast Guard?
17. Do you or does anyone in your family or close friends work in the maritime industry on fishing boats, ships, ferries, barges, tugs, dredges, etc.?
18. Do you or anyone you know have any experience operating or fishing from a boat?
19. Have you or has anyone you know been involved in a boating accident?
20. Do you or any family member or friends experience mental health issues? If so, please explain.
21. Have you and has anyone you know ever been treated by psychologist or psychiatrist?
22. Have you and has anyone you know been diagnosed with Post Traumatic Stress Disorder ("PTSD")?
23. Have you or any members of your family or close friends ever been involved or witnessed an accident involving injuries? If yes, please describe.
24. If selected as a juror in this case, your oath will require you to decide this case fairly and impartially, without sympathy, passion, bias or prejudice. You will be asked to decide the case based solely upon the evidence that you find believable and in accordance with the rules of law that I give you. At the end of the case, you will be instructed on the law regarding damages and will be instructed that you can only award money for those items of damages that are legally recoverable. Will you be able to follow the Court's instructions on the law and only award damages for those items that are legally

recoverable even if you disagree with what should or should not be a recoverable damages item?

25. Plaintiffs Michael Stepski, Geal Roderick and Benjamin Schober claim that they sustained PTSD as a result of a collision between the fishing boat they were working on and a ship owned and operated by the Defendants. If the evidence demonstrates that Defendants' vessel was not the ship involved in the collision would any of you feel that Plaintiffs should still recover money damages from Defendants?
26. If the evidence shows that Defendants' vessel was involved in the collision but that both the fishing vessel operated by Plaintiffs and Defendants' ship were each at fault in causing the collision would you be able to assess what percentage of fault was attributable to each vessel?
27. Would you believe a doctor's testimony simply because he is a doctor?
28. Would you accept the plaintiffs' version of the accident merely because they claim to have sustained PTSD?
29. Do you have trouble listening to testimony about pain and suffering?
30. Do you have a fear of the ocean or open water?
31. Is there any reason you would have any difficulty in judging whether a person is credible in his testimony in this case.
32. Do you have any religious, philosophical or moral reasons why you believe you cannot serve as a juror or which would prevent your from rendering a fair and impartial verdict?

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33. Do you hold an opinion which you believe may cause you to be unable to sit as a fair and impartial juror in this case?

Dated: New York, New York
March 15, 2010

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